



Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the matter of:

Amendment of §73.202 of the Commission's
Rules - Table of Allotments for FM
Broadcast Stations.

) MB Docket 02-376
) RM-10617
) (Sells, Arizona)
)
) RM-10690
) (Davis Monthan AFB, Phoenix
) and Wilcox, Arizona)

REPLY IN OPPOSITION
TO LAKESHORE MEDIA, LLC
PETITION FOR RECONSIDERATION

REC Networks ("REC") is a supporter of locally owned and diverse radio. REC currently operates several Internet only radio stations. REC also operates several websites including the original LPFM Channel Search Tool. REC Networks also represents the interests of independently owned Low Power FM ("LPFM") broadcast stations and their listeners. Since the above captioned proceeding will have an impact on the future of local radio in REC's area of interest¹, REC will review the proposal and provide the results of our research. REC has no plans to apply for the channel. REC should be considered an independent third party.

Lakeshore Media, LLC ("Lakeshore") has filed a *Petition for Reconsideration* in the above captioned proceeding stating that despite the relocation of KWCX-FM from Willcox to Davis-Monthan Air Force Base ("DMAFB"), Arizona creating a new "white" area, two new channels would provide service to the area².

REC will not challenge the "white area" portion of Lakeshore's argument for the reallocation to DMAFB. However, if the Commission accepts Lakeshore's argument on this issue, then the Commission should take into consideration the arguments raised by both REC³ and Journal

¹ - REC's "Area of Interest" include the entire states of Arizona and Nevada as well as the Southern California counties of Kern, Los Angeles, Inyo, San Bernardino, Ventura, Riverside, Orange, San Diego and Imperial.

² - Lakeshore *Petition for Reconsideration* at 1.

³ - REC *Comments* at 2.

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Broadcasting⁴ that DMAFB does not qualify as a community for allotment purposes. DMAFB is an Air Force base located in the Tucson urbanized area and is completely surrounded by the City of Tucson. DMAFB is no longer listed in the U.S. Census.

Based on the information presented by REC in this pleading and based on the previous pleadings of REC and Journal Broadcasting, we feel there is still a standing where the above captioned pleading can be denied due to DMAFB not qualifying as a community for allotment purposes.

Respectfully submitted,

/S/

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CERTIFICATE OF SERVICE

A copy of this pleading will be sent via First Class mail to the parties in this proceeding:

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⁴ - Journal Broadcasting *Reply Comments* at 2.